

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

:
: No. 12-md-2323-AB
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: MDL No. 2323
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THIS DOCUMENT RELATES TO
ALL ACTIONS

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**[PROPOSED] ORDER GRANTING THE
RIDDELL DEFENDANTS' MOTION TO DISMISS
BASED ON LMRA § 301 PREEMPTION**

Upon consideration of the motion to dismiss filed by Defendants Riddell, Inc.; All American Sports Corporation; Riddell Sports Group, Inc.; Easton-Bell Sports, Inc.; Easton-Bell Sports, LLC; EB Sports Corp.; and RBG Holdings Corp. (collectively, the "Riddell Defendants"), and after full consideration of the papers filed in connection with the motion, the arguments of counsel, and all other papers on file in this action, the Court rules that Plaintiffs' claims are preempted under § 301 of the Labor Relations Management Act and, it is hereby ORDERED that the motion is GRANTED, and the Amended Master Administrative Long-Form Complaint and the applicable Short-Form Complaints as against the Riddell Defendants are dismissed with prejudice.

DATED: _____, 2012

By: _____
HONORABLE ANITA B. BRODY